

EXHIBIT C

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IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

TYSON FOODS, INC., et al,)

Defendants.)

4:05-CV-00329-TCK-SAJ

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THE VIDEOTAPED DEPOSITION OF
ROBERT LAWRENCE, MD, produced as a witness on
behalf of the Defendants in the above styled and
numbered cause, taken on the 28th day of January,
2008, in the City of Tulsa, County of Tulsa, State
of Oklahoma, before me, Lisa A. Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

TULSA FREELANCE REPORTERS
918-587-2878

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1 data that I've seen strongly suggests that the
2 majority of this problem is arising from chicken
3 waste being applied.

4 Q Doctor, if we just simply looked at Lawrence
5 No. 1, one would be unable to identify the source of 10:27AM
6 the bacteria on Lawrence No. 1; isn't that true?

7 A If you just looked at the colonies growing in
8 the laboratory, that's correct.

9 Q Enterococci, E. coli and fecal coliform are
10 all three contained within the bodies of all 10:28AM
11 warm-blooded animals; is that true?

12 A I don't know whether all warm-blooded animals,
13 but certainly they're all present in warm-blooded
14 animals that are raised for human consumption.

15 Q What about wildlife? 10:28AM

16 A Wildlife contain most of these but not some of
17 the newer variants. These are very crude criteria.
18 You can fingerprint bacteria. You can -- there's
19 some very interesting data about the use of
20 antibiotic resistance patterns that can allow you to 10:29AM
21 say because of the antibiotic resistance pattern of
22 this Enterococcus, it could only have come from a
23 poultry house where antibiotics were in the feed or
24 it could only have come from a swine facility where
25 antibiotics were in the feed. 10:29AM